

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)	
)	NO. CR18-217 RSM
Plaintiff,)	
)	
vs.)	DEFENDANT'S UNOPPOSED
)	MOTION AND ORDER
)	TO MODIFY BOND CONDITIONS
GRIFFIN THOMPSON,)	
)	
)	
Defendant)	
_____)	

MOTION

Defendant Griffin Thompson, through his attorney Peter Mazzone, files this motion in support of modification of his bond conditions.

On September 19, 2018 Defendant Griffin Thompson was released from custody pursuant to an appearance bond. As a condition of his bond, defendant was released to third party custodian Kathryn Cantwell, and directed to reside at her residence located at 4200 84th Street NE, Apt. #10 in Marysville, WA 98270. He has been commuting to work to Whatcom County, WA on a daily basis since that time, and has also been in full compliance of his pre-trial release supervision conditions.

Defendant's Unopposed Motion and (Proposed) Order to Modify
Bond Conditions - 1

MAZZONE LAW FIRM, PLLC
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1 Recently, defendant Thompson was accepted in the NW Regional Carpenter's Union
2 Association Apprentice Program (apparently a very competitive position) which requires him
3 to be on call for dispatch work at short notice in Whatcom County, WA. In addition, his
4 girlfriend, Mikeala Murphy resides in Bellingham, WA and is eight months pregnant with
5 defendant's baby.
6

7 As a result defendant Thompson is asking the court to modify his bond conditions by:
8 1) removing Kathryn Cantwell as a third party custodian; and 2) allowing him to live at his
9 original residence in Whatcom County, located at 1404 East 36th Lane, Bellingham, WA
10 98226. He is making this request for several reasons. First, in order to meet his dispatch
11 obligations through the Carpenter's Union he simply cannot keep commuting from
12 Marysville, WA. Second, commuting costs have taken a toll on defendant Thompson's
13 finances and he is unable to meet his mortgage obligations (on his Bellingham house) as
14 things currently stand. And third, given the status of his girlfriends pregnancy, he needs to be
15 close to her for the many doctor appointments that she has to make.
16

17 Lisa Combs, defendant Thompson's pre-trial services officer, has visited defendant
18 Thompson's proposed new residence in Bellingham and does not oppose his move to that
19 residence. In addition, AUSA Kate Vaughan is well aware of defendant Thompson's
20 circumstances and proposed move to the new residence and also does not oppose it. Both
21 officer Combs and AUSA Vaughan also do not oppose removing Kathryn Cantwell as a third
22 party custodian for defendant Thompson.
23
24
25

1 For all of these reasons Mr. Thompson moves this Court for an order removing
2 Kathryn Cantwell as his third party custodian and allowing him to reside at the Bellingham
3 residence.

4 Respectfully submitted this 28th day of March, 2019.

5
6 s/Peter Mazzone
7 Peter Mazzone WSBA #25262
8 Attorney for Defendant

9 **ORDER**

10 Having reviewed Defendant's Unopposed Motion to Modify Bond Conditions

11 IT IS HEREBY ORDERED that Kathryn Cantwell be removed as third party
12 custodian for defendant Thompson, and that Mr. Thompson be allowed to live at his residence
13 located at 1404 East 36th Lane, Bellingham, WA 98226.
14

15 DATED this 2nd day of April, 2019.

16
17 

18 RICARDO S. MARTINEZ
19 UNITED STATES DISTRICT JUDGE
20
21

22 Presented by:
23 s/Peter Mazzone
24 Peter Mazzone, WSBA #25262
25

Defendant's Unopposed Motion and (Proposed) Order to Modify
Bond Conditions - 3

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5 **CERTIFICATE OF SERVICE**

6 I hereby certify that on March 28, 2019, I electronically filed the foregoing with the
7 Clerk of the Court using the CM/ECF system which will send notification of such filing to the
8 attorney(s) and persons of record. I hereby certify that I have served all non CM/ECF
9 participants via United States Postal Service.

10 s/ Aleshia Johnson

11 Aleshia Johnson
12 Paralegal
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